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State of Utah

DEPARTMENT OF NATURAL RESOURCES

MICHAEL R. STYLER
Executive Director

Division of Oil, Gas and Mining

JOHN R. BAZA
Division Director

June 25, 2019

Kirt Tatton, General Manager
Canyon Fuel Company, LLC
P.O. Box 1029
Wellington, Utah 84542

Subject: Removal of Water Monitoring Sites, Canyon Fuel Company, LLC, Dugout Canyon Mine, C/007/0039, Task #5928

Dear Mr. Tatton:

The Division has reviewed your application. The Division has identified deficiencies that must be addressed before final approval can be granted. The deficiencies are listed as an attachment to this letter.

The deficiencies authors are identified so that your staff can communicate directly with that individual should questions arise. The plans as submitted are denied. Please resubmit the entire application by no later than July 25, 2019.

If you have any questions, please call me at (801) 538-5350.

Sincerely,

Steve Christensen
Coal Program Manager

SKC/sqs

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Technical Analysis and Findings

Utah Coal Regulatory Program

PID: C0070039
TaskID: 5928
Mine Name: DUGOUT CANYON MINE
Title: REMOVAL OF WATER MONITORING SITES

General Contents

Permit Application Format and Contents

Analysis:

The application does not meet the State of Utah R645 requirements for Permit Application Format and Contents.

The applicant submitted updated Tables 7-4 and 7-5 of the MRP without indications of edits made to the content.

Deficiencies Details:

The amendment does not meet the State of Utah R645-301-120. The following deficiency must be addressed prior to final approval:

R645-301-121-300: The Permittee must clearly indicate changes made to the MRP through methods such as redline/strikeout. Changes were made to content in Tables 7-4 & 7-5 without providing markups.

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Operation Plan

Hydrologic Ground Water Monitoring

Analysis:

The application does not meet the State of Utah R645 requirements for Groundwater Monitoring.

The Permittee has designated the following springs to be discontinued from their monitoring program: 321, 324, 259A, 203, SC-116, SC-65, & SC-100. The MRP has been updated with brief information, but without sufficient analysis to demonstrate that monitoring is no longer necessary to assess potential impacts to the groundwater systems overlying the Blackhawk Formation, due not only to subsidence but also from mine dewatering activities, as described in section 731.200 of the currently approved Dugout MRP.

Groundwater well GW-11-2's monitoring protocol has been updated in Table 7-4 to reflect the previously approved monitoring status defined in 731.200 - Water Monitoring section of the MRP.

Deficiencies Details:

The amendment does not meet the State of Utah R645 requirements for Groundwater Monitoring. The following deficiency must be addressed prior to final approval:

R645-301-214: The Permittee must provide sufficient analysis and justification for the discontinuation of monitoring activities at groundwater monitoring sites 321, 324, 259A, 203, SC-116, SC-65, & SC-100. This includes information regarding whether these monitoring sites are still necessary for the purposes laid out in section 731.200 of the approved Dugout MRP.

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Hydro Surface Water Monitoring

Analysis:

The application does not meet the State of Utah R645 requirements for Surface Water Monitoring.

Table 7-5 Surface Water Monitoring Program, was edited to discontinue monitoring at stream locations PC-1a and RC-1. No justification or analysis was provided as to why these sites should no longer be monitored.

Deficiencies Details:

The amendment does not meet the State of Utah R645 requirements for Surface Water Monitoring. The following deficiency must be addressed prior to final approval:

R645-301-731.224: The Permittee must provide sufficient analysis and justification for the discontinuation of monitoring activities at surface water monitoring sites PC-1a and RC-1.

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